## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

:

In Re:

Chapter 13

JOSEPH C. CORLISS; and SUSAN A. SHARPE-CORLISS

Case No. 23-18928-ABA

Debtors.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS AND RESERVATION OF RIGHTS

PLEASE TAKE NOTICE that the undersigned enters her appearance on behalf of Lakebridge Community Services Association, Inc. ("Lakebridge"), as a creditor and/or party in interest herein, and pursuant to Rules 2002, 7004, 9007 and 9010(b) of the Rules of Bankruptcy Procedure hereby demands that all notices given or required in this case and all documents and all other papers served in this case, be given to and served upon the undersigned at the offices and telephone numbers and fax numbers set forth below:

Lakebridge Community Services Association, Inc.
c/o Boudwin Ross Roy Leodori PC
Attn: Rebecca D. Boudwin, Esquire
10000 Midlantic Drive, Suite 100E
Mount Laurel, New Jersey 08054
Tel. No. (856) 390-3900
Fax No. (856) 390-3920
Email Address: rboudwin@brrllaw.com

PLEASE TAKE FURTHER NOTICE that in addition to the notices required pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, the foregoing request includes not only the notices and papers referred to in the rule specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed

Case 23-18928-ABA Doc 27 Filed 12/20/23 Entered 12/20/23 10:54:32 Desc Main Document Page 2 of 3

by mail, hand delivery, telephone, electronically or otherwise, which affects the Debtors or the property of the Debtors, including those orders and notices (1) that affect or seek to affect in any way any rights or interests of any creditor or party in interest in this case, Lakebridge with respect to: (a) the Debtors; (b) property of the estate or proceeds thereof in which the Debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the Debtors may seek to use; or (2) that require or seek to require any act, delivery of any property, payment, or other conduct by Lakebridge.

PLEASE TAKE FURTHER NOTICE that Lakebridge intends that neither this Notice of Appearance, nor any later appearance, pleading, claim or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to which Lakebridge is or may be entitled to under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

Case 23-18928-ABA Doc 27 Filed 12/20/23 Entered 12/20/23 10:54:32 Desc Main Document Page 3 of 3

This appearance and demand for notice is without prejudice to the rights, remedies and

claims of Lakebridge against other entities or any objection by Lakebridge that may be made to

the subject matter jurisdiction of the Court or the propriety of venue herein and shall not be deemed

or construed to submit Lakebridge to the jurisdiction of the Court. All rights, remedies and claims

are hereby expressly reserved, including without limitation, the making of a motion seeking

abstention, withdrawal, dismissal or transfer of the case or a proceeding therein.

**BOUDWIN ROSS ROY LEODORI PC** 

Attorneys for Lakebridge Community Services

Association, Inc.

Dated: December 20, 2023

By: /s/Rebecca D. Boudwin

REBECCA D. BOUDWIN